

DONALD R. BROWN (Bar No. CA 156548)
E-mail: dbrown@manatt.com
CARL L. GRUMER (Bar No. CA 066045)
E-mail: cgrumer@manatt.com
MANATT, PHELPS & PHILLIPS, LLP
11355 West Olympic Boulevard
Los Angeles, CA 90064-1614
Telephone: (310) 312-4000
Facsimile: (310) 312-4224

JONATHAN I. BLACKMAN (*Pro Hac Vice to be filed*)
E-mail: jblackman@cgsh.com
CARMINE D. BOCCUZZI (*Pro Hac Vice to be filed*)
E-mail: cboccuzzi@cgsh.com
MICHAEL M. BRENNAN (*Pro Hac Vice to be filed*)
E-mail: mbrennan@cgsh.com
CLEARY GOTTLIEB STEEN & HAMILTON
One Liberty Plaza
New York, NY 10006
Telephone: (212) 225-2000
Facsimile: (212) 225-3999

Attorneys for Defendant
THE REPUBLIC OF ARGENTINA

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT

NML CAPITAL, LTD.,
Plaintiff,
vs.

SPACE EXPLORATION
TECHNOLOGIES CORP., aka
SPACEX, a Delaware corporation;
THE REPUBLIC OF ARGENTINA, a
foreign state, including its *COMISION*
NACIONAL DE ACTIVIDADES
ESPACIALES, aka CONAE, a political
subdivision of the Argentine State; and
DOES 1-10,
Defendants.

No. 14 CV 02262-SVW-Ex
[*Hon. Stephen V. Wilson*]

DECLARATION OF DONALD R. BROWN

[Filed concurrently with
(1) Not. of Mot. and Mot. to Dismiss,
and (2) Declaration of Conrado F.
Varotto]

Hearing Date: June 30, 2014
Time: 1:30 p.m.
Courtroom: 6

Compl. filed: March 25, 2014

DECLARATION OF DONALD R. BROWN

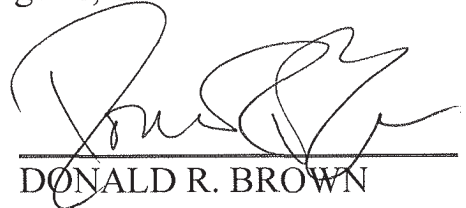
I, Donald R. Brown, declare as follows:

1. I am an attorney at law duly licensed to practice before this Court and all courts of the State of California. I am a partner in the law firm of Manatt, Phelps & Phillips, LLP, attorneys of record for defendant the Republic of Argentina. I have personal knowledge of the facts set forth herein, and if called to testify, I could and would competently testify to those matters.

2. Attached as Exhibit A is a copy of an unpublished decision by the Supreme Court of the State of New York, Commercial Division, Westchester County, in *Brant Point, Ltd. v. The Republic of Congo*, No. 4238/04. The decision is dated December 12, 2006.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 15, 2014, in Los Angeles, California.


DONALD R. BROWN